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Attorneys for Defendants
Giga Watt, Inc., GigaWatt Pte. Ltd.,
Cryptonomos Pte. Ltd., and Dave Carlson

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MARK MOSS an individual,
Plaintiff,
v.

GIGA WATT, INC., a Washington
corporation, and GIGA WATT, PTE,
LTD., a foreign corporation,
Defendants.

RAYMOND BALESTRA, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

GIGA WATT, INC., GIGAWATT PTE
LTD., CRYPTONOMOS PTE. LTD.,
and DAVE CARLSON,
Defendants.

CASE NO.: 2:18-cv-00100-SMJ
CASE NO.: 2:18-cv-00103-SMJ (lead)

CLASS ACTION

UNOPPOSED MOTION FOR LEAVE
TO WITHDRAW AS COUNSEL FOR
DEFENDANTS GIGA WATT, INC.,
DAVE CARLSON, GIGA WATT PTE.
LTD., AND CRYPTONOMOS PTE.
LTD.

UNOPPOSED MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
Lead Case No. 2:18-cv-00103

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1 On March 19, 2018, Plaintiff Mark Moss filed a complaint alleging
2 violations of Section 12(a)(1) of the Securities Act of 1933 (“Securities Act”) and
3 Section 21.20.140 of the Washington Securities Act against Defendants Giga Watt,
4 Inc., and GigaWatt Pte. Ltd. (the “Moss Action”). The next day, March 20, 2018,
5 Plaintiff Raymond Balestra filed a putative class action complaint alleging
6 violations of Sections 12(a)(1) and 15(a) of the Securities Act against Giga Watt,
7 Inc., GigaWatt Pte. Ltd., Cryptonomos Pte. Ltd., and Dave Carlson (collectively,
8 “Defendants”) (the “Balestra Action”).

9 On April 13, 2018, Barry M. Kaplan and Gregory L. Watts of Wilson
10 Sonsini Goodrich & Rosati, PC (collectively, “WSGR”) entered notices of
11 appearance as counsel for Defendants in both actions, followed by Stephanie L.
12 Jensen of WSGR on July 2, 2018.

13 On July 3, 2018, the Court consolidated both actions, with the Balestra
14 Action serving as the lead case.

15 On October 3, 2018, the Court entered an order directing Plaintiffs to file a
16 consolidated complaint or designate an operative complaint by October 24, 2018.

17 On October 24, 2018, Plaintiffs filed a consolidated complaint, naming
18 Defendants and two new defendants—Leonid Markin and Edward Khaptakhaev
19 (“New Defendants”).

20 On October 31, 2018, Joel E. Wright of the law firm of Lee Smart, P.S., Inc.
21 filed a notice of appearance in this consolidated action on behalf of Giga Watt,
22 Inc., Dave Carlson, Leonid Markin and Edward Khaptakhaev. Mr. Wright has not
23 filed a notice of appearance for defendants Giga Watt Pte. Ltd. or Cryptonomos
24 Ptd. Ltd.

1 Now, with the consent of its clients Giga Watt, Inc., Dave Carlson, Giga
2 Watt Pte. Ltd. and Cryptonomos Pte. Ltd., WSGR seeks to withdraw from their
3 representation in the above-captioned matters. WSGR seeks to withdraw as
4 counsel due to Defendants' unpaid invoices for work performed in connection with
5 both these consolidated actions and another matter. WSGR has not appeared for
6 Markin or Khaptakhaev in this action.

7 This proposed motion to withdraw and substitute counsel will leave Giga
8 Watt Pte. Ltd. and Cryptonomos Pte. Ltd. without representation in either above-
9 captioned matter.

10 WSGR has conferred with counsel for Plaintiffs in both matters, and
11 Plaintiffs do not oppose the proposed motion to withdraw as counsel.

12 Based on the foregoing, Defendants move for an order from the Court to the
13 following effect:

14 WSGR shall be permitted to withdraw from representation of Giga Watt,
15 Inc., Dave Carlson, Giga Watt Pte. Ltd. and Cryptonomos Pte. Ltd. in both above-
16 captioned matters, and ECF notifications in both matters will be updated
17 accordingly to remove WSGR.

18 Respectfully submitted and dated this 7th day of November, 2018.

19 WILSON SONSINI GOODRICH & ROSATI
20 Professional Corporation

21 By: /s/ Barry M. Kaplan

22 Barry M. Kaplan, WSBA #8661
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*Attorneys for Defendants Giga Watt, Inc.,
GigaWatt Pte. Ltd., Cryptonomos Pte. Ltd.,
and Dave Carlson*

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Blythe H. Chandler	bchandler@terrellmarshall.com
Brittany J. Glass	bglass@terrellmarshall.com
Beth E. Terrell	bterrell@terrellmarshall.com
Barry M. Kaplan	bkaplan@wsgr.com, rcarter@wsgr.com
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I certify that I served the foregoing by email to the following:

Donald J. Enright	denright@zlk.com
Roger M. Townsend	rtownsend@bjtlegal.com
Joel E. Wright	jw@leesmart.com
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/s/ Barry M. Kaplan

Barry M. Kaplan, WSBA #8661
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